

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SUSQUEHANNA RADIO LLC**

**Plaintiff**

**v.**

**JACOB KEMP and DANIEL MCDOWELL**

**Defendants**

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**CIVIL ACTION NO. 3:23-CV-01746-S**

**DEFENDANTS' MOTION FOR LEAVE TO EXCEED PAGE LIMIT**

1. Defendants move for leave to exceed the page limit from the local rules for purposes of briefing their 12(b) motions.
2. Because Plaintiff has alleged breach of contract claims for many provisions of Defendants' employment contracts – each with its own set of National Labor Relations Act authority – extensive briefing is required to explain why each of the claims is preempted by the exclusive jurisdiction of the National Labor Relations Board.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF CONFERENCE**

Counsel for Defendants requested Plaintiff's counsel's agreement to this motion via e-mail on September 11<sup>th</sup>, 2023. No response was received.

/s/ Philip Kingston